

# **Exhibit B**

**Exhibit B: Materials Innovatus Is Requesting To Be Sealed**

Location	Description
<b><u>Category:</u> <i>Innovatus’ Investment in the RTL Business, Number of RTLs, and Business Projections and Results</i></b>	
Letter, page 3, third full paragraph, lines 8–9, starting with “lost” and ending with “employees”	Describes purported results of Innovatus’ RTL business.
Letter, full paragraph at the end of page 3 and continuing to the top of page 4	Cites prospective and actual RTL activity in 2018 and 2019.
Letter, page 4, last two lines of second full paragraph	Cites prospective and actual RTL activity in 2020.
Letter, page 5, second full paragraph, lines 1–2	References amount of Redibs investment request in 2020 and quotes internal memorandum while characterizing Redibs’ purported business prospects.
Letter, page 5, third full paragraph, line 3, first two words	Characterizes purported level of success of Innovatus’ RTL business model.
Letter, page 5, third full paragraph, last two lines	References amount of Innovatus investment in Redibs and quotes internal communications while characterizing Redibs’ purported business prospects.
Letter, page 5, fourth full paragraph, line 1	Cites actual RTL activity, to date.
Letter, page 7, first paragraph, lines 3–5, starting with “At” and ending with “program”	References states in which Innovatus operated its RTL business at different points in time, and current number of active agents.
Ex. 3 (Dkt. 241-3) Ex. 5 (Dkt. 241-6) Ex. 6 (Dkt. 241-7) Ex. 15 (Dkt. 241-16) Ex. 19 (Dkt. 241-20) Ex. 20 (Dkt. 241-21) Ex. 23 (Dkt. 241-24)	Detailed presentations including operations, results, strategy, and projections for the Redibs business.
Ex. 10 (Dkt. 241-11) Ex. 12 (Dkt. 241-13) Ex. 13 (Dkt. 241-14) Ex. 14 (Dkt. 241-15)	Memoranda to the Innovatus Investment Committee, in which Redibs provides operational and financial results, documents the level of Innovatus investment and

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Ex. 18 (Dkt. 241-19) Ex. 21 (Dkt. 241-22)	expected rates of return, and includes a large amount of internal strategic business planning content.
Ex. 22 (Dkt. 241-23)	FLR Tracker, reporting on all Redibs' RTL activity through September 30, 2021.
<b><u>Category:</u> <i>Innovatus' Strategic Business Development Reporting and Decision-making</i></b>	
Letter, page 2, second full paragraph in its entirety	Quotes from and references to internal communications and characterizes Redibs' purported business development and prospects.
Letter, page 2, third full paragraph, lines 1–6	Quotes from and references to internal communications and characterizes Redibs' purported business development and prospects.
Letter, page 2, footnote 2 in its entirety	Quotes from four highly confidential internal communications and presentations regarding specifics of Innovatus' RTL business model and associated analysis.
Letter, page 4, first full paragraph in its entirety	Quotes from and references to internal communications and memorandum and characterizes Redibs' purported business development and prospects and associated analysis.
Letter, page 4, second full paragraph, lines 1–6	Quotes from and references to internal communication and characterizes Redibs' purported business development and prospects and associated analysis.
Letter, page 4, last three paragraphs in their entirety	Quotes from Investment Committee Memorandum regarding internal analysis of Redibs' performance and business planning.
Letter, page 4, footnote 3 in its entirety	Quotes from and references internal presentation and characterizes Redibs' purported business performance and decision-making.

Location	Description
Letter, page 5, first three paragraphs in their entirety	Quotes from Investment Committee Memoranda and presentations and characterizes Redib's purported business performance and decision-making.
Letter, page 5, fourth full paragraph, lines 3–4, starting with “According” and ending with “model”	References Highly Confidential deposition testimony regarding Redibs' business planning and expected performance.
Letter, page 5, Heading III, starting with “insulate” and ending with “Provision”	Quotes from internal documents regarding Innovatus' purported RTL business strategy.
Letter, page 5, last paragraph, lines 2–4, starting with “using” and ending with “competition”	References and characterizes internal documents regarding Innovatus' purported RTL business strategy.
Letter, page 6, first two paragraphs in their entirety	Quotes from and references internal communication, presentation, and memoranda and characterizes Redibs' purported RTL business strategy and decision-making.
Letter, page 6, third paragraph, lines 1–13, starting with “Even” and ending with “provision”	Quotes from and references internal presentations and memorandum and characterizes Redibs' purported RTL business strategy and decision-making.
Letter, page 6, third paragraph, last two lines	References internal documents regarding Innovatus' purported RTL business strategy.
Letter, page 6, last paragraph, last two lines, starting with “An” and ending with “1st”	Quotes from and references internal memorandum and characterizes Redibs' purported RTL business strategy and decision-making.
Letter, page 7, first paragraph, lines 1–3, starting with “mover” and ending with “NDA”	Quotes from and references internal presentation and characterizes Redibs' purported RTL business strategy and results.
Letter, page 7, first paragraph, last two lines, starting with “But” and ending with “competition”	Cites information from internal presentation and characterizes Redibs' purported RTL business strategy and results.
Ex. 1 (Dkt. 241-1) Ex. 2 (Dkt. 241-2) Ex. 9 (Dkt. 241-10)	Internal emails and attachments regarding various development and strategy discussions for Innovatus' RTL business.

Location	Description
Ex. 11 (Dkt. 241-12)	
Ex. 3 (Dkt. 241-3) Ex. 4 (Dkt. 241-4 & 241-5) Ex. 5 (Dkt. 241-6) Ex. 6 (Dkt. 241-7) Ex. 15 (Dkt. 241-16) Ex. 16 (Dkt. 241-17) Ex. 17 (Dkt. 241-18) Ex. 19 (Dkt. 241-20) Ex. 20 (Dkt. 241-21) Ex. 23 (Dkt. 241-24)	Detailed presentations including operations, results, strategy, planning, milestones, and projections for the Redibs business.
Ex. 10 (Dkt. 241-11) Ex. 12 (Dkt. 241-13) Ex. 13 (Dkt. 241-14) Ex. 14 (Dkt. 241-15) Ex. 18 (Dkt. 241-19) Ex. 21 (Dkt. 241-22)	Memoranda to the Innovatus Investment Committee, in which Redibs provides operational and financial results, documents the level of Innovatus investment and expected rates of return, and includes a large amount of internal strategic business planning content.
<b><u>Category:</u> Identities of Actual and Potential Business Partners</b>	
Letter, page 6, footnote 4 in its entirety	References Highly Confidential deposition testimony identifying a brokerage partner by name and characterizes the purported status of that partner's relationship with Redibs.
Ex. 6 (Dkt. 241-7) Ex. 20 (Dkt. 241-21) Ex. 23 (Dkt. 241-24)	Detailed presentations including operations, results, strategy, planning, milestones, and projections for the Redibs business, and references various actual and prospective brokerage partners.
<b><u>Category:</u> Innovatus' RTL Business Methods</b>	
Letter, page 2, footnote 1 in its entirety	Quotes from one of the 20 RTL confidential business methods Innovatus has identified in this litigation.
Letter, page 3, first full paragraph, line 12, starting with "As Mr." and ending with "week"	References confidential deposition testimony related to Innovatus' confidential RTL business methods.